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7 Attorneys for Plaintiff

8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

10
11 JORDAN DEPPE, Deceased, by and through his)
Successor in Interest, MICHAEL DEPPE; and)
12 MICHAEL DEPPE, Individually,)
13 Plaintiff,) Case No. 2:22-cv-00187-TLN-JDP
14 vs.)
15 SHASTA COUNTY, a public entity; SHASTA)
COUNTY SHERIFF-CORONER ERIC MAGRINI,)
16 in his individual capacity; CAPTAIN GENE)
RANDALL; WELLPATH INC., a Delaware)
17 corporation; WELLPATH MANAGEMENT, INC.,)
a Delaware Corporation; WELLPATH LLC, a)
18 Delaware Limited Liability Company;)
CALIFORNIA FORENSIC MEDICAL GROUP,)
19 INC., a California Corporation; SANAZ PARSA,)
M.D.; TRACI LEWIS, L.M.F.T; SHEA PHINNEY,)
20 L.M.F.T.; DANIEL DELLWO, P.A.; and DOES 1–)
21 20; individually, jointly and severally,)
22 Defendants.)
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**STIPULATION AND ORDER TO
MODIFY SCHEDULING ORDER
(Doc. 5)**

1 Pursuant to the Court's instruction on May 20, 2022, after the parties filed their Joint Case
2 Management Statement (Doc. 17), the parties hereby stipulate and agree to modify the Scheduling
3 Order in this matter (Doc. 5) as follows:

4 1. This is a civil rights wrongful death/survival action arising from allegations of the
5 Defendants' deliberate indifference to the serious medical and mental health needs of pretrial
6 detainee, Jordan Deppe, resulting in his suicide on January 7, 2021, at the Shasta County jail, with a
7 date of death of January 8, 2021.

8 2. This case involves a large number of participants, including six currently known
9 individual defendants and five entity defendants, represented by three sets of counsel. Based on the
10 complexities of the issues presented, the number of parties, records involved, and anticipated
11 depositions, an additional amount of time is needed to accommodate the schedules of all parties and
12 deponents, to allow for the completion of discovery and expert disclosures, to allow the experts time
13 to complete their review of deposition transcripts before writing their reports, and to allow sufficient
14 time for pretrial preparation.

15 3. While all parties have agreed that the proposed modifications will allow the parties
16 additional time to adequately prepare for trial, the parties are mindful of the overcrowded Eastern
17 District docket, the demands placed on Eastern District judges, and the Court's limited resources,
18 especially during this pandemic. The parties are represented by experienced counsel who have
19 worked together before, sometimes on many cases, and will continue to work cooperatively
20 together, and in an orderly fashion, and believe that they will complete all necessary discovery and
21 pretrial matters with this extension of the deadlines.

1 4. The parties therefor stipulate to an extension of the dates in this matter. The
 2 modification of the discovery, dispositive motion, and pretrial dates, as requested in the parties'
 3 Joint Case Management Statement (Doc. 17), would move dates as follows:

<u>Event</u>	<u>Current Date</u>	<u>New Date</u>
Close of Fact Discovery	December 28, 2022	June 30, 2023
Expert Disclosures due	February 24, 2023	August 25, 2023
Rebuttal Expert Disclosures	March 28, 2023	September 29, 2023
Close of Expert Discovery	<i>Counsel are instructed to complete all discovery of expert witnesses in a timely manner in order to comply with the Court's deadline for filing dispositive motions.</i>	October 27, 2023
Dispositive Motion filing deadline	January 26, 2023	July 27, 2023
Joint Notice of Trial Readiness	April 27, 2023	October 27, 2023

16 For the foregoing reasons, the parties respectfully request that this Court enter an order
 17 extending the discovery, dispositive motion, and pretrial dates in this case as set forth above, and
 18 pursuant to the parties' Joint Case Management Statement.

20 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

23 Dated: May 31, 2022

HADDAD & SHERWIN LLP

25 _____
 /s/ *Teresa Allen*

26 TERESA ALLEN
 27 Attorneys for Plaintiff

1 Dated: May 31, 2022

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP

3 */s/ Lynn L. Carpenter*
4

5 MILDRED K. O'LINN
6 LYNN L. CARPENTER
7 KAYLEIGH A. ANDERSEN
8 Attorneys for Defendants
9 SHASTA COUNTY, SHERIFF-CORONER ERIC
10 MAGRINI, and CAPTAIN GENE RANDALL

10 Dated: May 31, 2022

BERTLING LAW GROUP, INC.

12 */s/ Jemma Parker Saunders*
13

14 PETER BERTLING
15 JEMMA PARKER SAUNDERS
16 Attorneys for Defendants
17 WELLPATH INC., WELLPATH MANAGEMENT,
18 INC., WELLPATH LLC, CALIFORNIA FORENSIC
19 MEDICAL GROUP INC., TRACY LEWIS, L.M.F.T.,
20 SHEA PHINNEY, L.M.F.T., and DANIEL DELLWO,
21 P.A.

19 Dated: May 31, 2022

LAURIA TOKUNAGA GATES & LINN, LLP

21 */s/ Anthony Lauria*
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23 ANTHONY LAURIA
24 Attorneys for Defendant SANAZ PARSA, M.D.
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ORDER

Based on the parties' stipulation, and with good cause appearing,

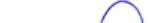
IT IS HEREBY ORDERED that the Pretrial Scheduling Order (Doc. 5) is modified as follows:

<u>Event</u>	<u>Current Date</u>	<u>New Date</u>
Close of Fact Discovery	December 28, 2022	June 30, 2023
Expert Disclosures due	February 24, 2023	August 25, 2023
Rebuttal Expert Disclosures	March 28, 2023	September 29, 2023
Close of Expert Discovery	<i>Counsel are instructed to complete all discovery of expert witnesses in a timely manner in order to comply with the Court's deadline for filing dispositive motions.</i>	October 27, 2023
Dispositive Motion filing deadline	January 26, 2023	November 27, 2023
Joint Notice of Trial Readiness	April 27, 2023	October 27, 2023

All other dates set forth in Doc. No. 5 will remain the same.

IT IS SO ORDERED.

Dated: June 1, 2022


Troy L. Nunley
United States District Judge